

DEC 21 1982

File
Armed
Union Wire Rope
MOD001686740

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jerry R. Fuller
Senior Civil Engineer
Armed, Incorporated
Union Wire Rope Division
7000 Roberts Street
Kansas City, Missouri 64125

Dear Mr. Fuller:

Armed, Inc., Union Wire Rope Division
Docket No. 83-N-001

ARHM/SWMG
DEC 23 1982
Region VII K.C., MO

Enclosed you will find a Complaint, Compliance Order and Notice of Opportunity for Hearing issued this day pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6928, to Armed, Inc., Union Wire Rope Division by the United States Environmental Protection Agency (EPA), Region VII. In accordance with the terms of this Order, Armed, Inc., Union Wire Rope Division must:

1. Immediately upon receipt of this Order, stop discharging waste 1,1,1- trichloroethane into the Blue River.
2. Immediately upon receipt of this Order, stop disposing on-site, waste 1,1,1- trichloroethane.
3. Within thirty (30) days of receipt of this Order, submit a plan to EPA for removing and properly disposing of all hazardous waste previously disposed of at the facility.
4. Within thirty (30) days of receipt of this Order, either:
(i) meet the requirements of 40 C.F.R. §261.5(g)(3) pertaining to small quantity generators or (ii) comply with all applicable requirements of 40 C.F.R. Parts 262 through 265 and Parts 122 and 124.



RCRA

Doyle	Colver	Sanderson	R. Michael	John Horton	PEMBERTON	SPRATLIN	WAGONER
Armed	Armed	Armed	PCAF	PCAF	CNSL	ARHM	ARHM
Doyle	Doyle	SS			Donahue	Ch	RAY
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5. Within forty-five (45) days of receipt of this Order, determine if the waste paint stripper sludge, presently stored on-site, is a hazardous waste pursuant to 40 C.F.R. §261 and submit evidence of that determination to EPA.
6. If the waste paint stripper sludge is determined to be a hazardous waste, within ninety (90) days of receipt of this Order, remove and properly dispose of all waste paint stripper sludge presently stored on-site.

The Complaint also proposes to assess penalties totaling \$19,250 for past violations. Please note that §3008(a)(3) of RCRA authorizes a civil penalty of up to \$25,000 for each day of continued non-compliance with the terms of the Compliance Order.

EPA encourages an informal conference between the parties in an effort to effect a settlement. If you would like to discuss this matter at an informal conference, please contact me at 816/374-3171.

Sincerely,

J. Scott Pemberton
Attorney
Office of Regional Counsel
Region VII

Enclosure

cc: Art Groner
Missouri Department Natural Resources

bcc: / Sanderson AWCN	Karen Sherrill CNSL
Forby WMBR	Fairless ENSV
Doherty, EP&R	Headquarters

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DEC 22 1982

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
324 EAST 11TH STREET
KANSAS CITY, MISSOURI 64106

IN THE MATTER OF

ARMCO, INC., UNION WIRE ROPE
DIVISION
Kansas City, Missouri,

Respondent.

Proceedings Under Section 3008(a)(1)
of the Resource Conservation and
Recovery Act of 1976, as amended,
42 U.S.C. §6928(a)(1).

WASTE
MANAGEMENT PROGRAM
Docket No. 83-H-001

COMPLAINT, COMPLIANCE ORDER

AND

NOTICE OF OPPORTUNITY FOR HEARING

PRELIMINARY STATEMENT

This Complaint, Compliance Order and Notice of Opportunity for Hearing is issued pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. §6928(a)(1), and in accordance with the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22. The Complainant is the U.S. Environmental Protection Agency (EPA), Region VII. The Respondent is ARMCO, Inc., Union Wire Rope Division, an Ohio corporation authorized to do business in the state of Missouri.

As a result of inspections conducted at Respondent's facility by EPA on July 1, 1982, and August 27, 1982, and correspondence between EPA and Respondent, Complainant has determined Respondent to be in violation of Section 3010(a) of RCRA, 42 U.S.C. §6930(a); Section 3005(a) of RCRA, 42 U.S.C. §6925(a); and the regulations at 40 C.F.R. §122.22, 40 C.F.R. §262.20(a), 40 C.F.R. §262.34(a)(3), and 40 C.F.R. §262.34(a)(4), 40 C.F.R. §265.31, and 40 C.F.R. §262.11.

The Complaint below establishes these violations and proposes a civil penalty for each violation pursuant to Section 3008(g) of RCRA, 42 U.S.C. §6928(g). Said penalties are based on the seriousness of the violations, the threat of harm to public health or the environment, and the efforts of the Respondent to comply with the applicable requirements.

COMPLAINT

Count I

1. Respondent owns and operates a hazardous waste management facility located at 2100 Manchester, Kansas City, Missouri.

2. Respondent is a generator, as defined in 40 C.F.R. §260.10, of waste 1,1,1-trichloroethane, a hazardous waste listed as F001 and identified in 40 C.F.R. §261.31.

3. The regulation at 40 C.F.R. §261.5, promulgated pursuant to Section 3001 of RCRA, 42 U.S.C. §6921, states in part:

"(g) In order for hazardous waste generated by a small quantity generator to be excluded from full regulation under this section, the generator must:

... (3) either treat or dispose of his hazardous waste in an on-site facility, or ensure delivery to an off-site storage, treatment, or disposal facility, either of which is:

- (i) permitted under Part 122 of this chapter;
- (ii) in interim status under Parts 122 and 265 of this chapter;
- (iii) authorized to manage hazardous waste by a State with a hazardous waste management program approved under Part 123 of this chapter;
- (iv) permitted, licensed or registered by a state to manage municipal or industrial solid waste; or
- (v) a facility which:
 - (A) beneficially uses or re-uses, or legitimately recycles or reclaims his waste, or
 - (B) treats his waste prior to beneficial use or re-use, or legitimate recycling or reclamation."

4. On and prior to July 1, 1982, Respondent disposed of the hazardous waste 1,1,1-trichloroethane by discharging the waste down a drain located in Respondent's die cleaning room, said drain being connected to a city storm sewer leading to the Blue River.

5. On and prior to August 27, 1982, Respondent stored the hazardous waste 1,1,1-trichloroethane in a 700-gallon storage tank.

6. On and prior to August 27, 1982, Respondent transported or offered for transportation the hazardous waste 1,1,1-trichloroethane to ARMCO, Inc., Midwestern Steel Division, located at 7000 Roberts, Kansas City, Missouri, for the purpose of burning the hazardous waste in a boiler.

7. Respondent's disposal, storage and transporting activities, referred to in paragraphs 4, 5, and 6 respectively, was in a manner inconsistent with the requirements of 40 C.F.R. §261.5(g)(3).

8. As Respondent's activities regarding the disposal, storage and transportation of the hazardous waste 1,1,1-trichloroethane was in a manner inconsistent with the requirements of 40 C.F.R. §261.5(g)(3), the subject hazardous waste is subject to full regulation under RCRA, thereby requiring the filing of a Notification under Section 3010(a) of RCRA, 42 U.S.C. §6930(a).

9. Section 3010(a) of Subtitle C of RCRA, 42 U.S.C. §6930(a) provides, in part:

"Not later than ninety days after promulgation of regulations under Section 3001 identifying by its characteristics or listing any substance as hazardous waste subject to this subtitle, any person generating or transporting such substance or owning or operating a facility for treatment, storage, or disposal of such substance shall file with the Administrator (or with states having authorized hazardous waste permit programs under Section 3006) a notification stating the location and general description of such activity and the identified or listed hazardous wastes handled by such persons."

Furthermore, Section 3010(a) of RCRA, 42 U.S.C. §6930(a) states:

"No identified or listed hazardous waste subject to this subtitle may be transported, treated, stored, or disposed of unless notification has been given as required under this subsection."

10. The regulation at 40 C.F.R. §261.31 listing spent 1,1,1-trichloroethane (listed as F002) as a hazardous waste subject to Subtitle C of RCRA was promulgated under Section 3001 of RCRA, 42 U.S.C. §6921, on May 19, 1980 [45 Fed. Reg. 33122 (1980)].

11. On or about August 18, 1980, Respondent notified EPA of its hazardous waste handling activities, pursuant to Section 3010(a) of RCRA, 42 U.S.C. §6930(a). This notification did not indicate that Respondent generated or transported, and either treated, stored or disposed of the hazardous waste, spent 1,1,1-trichloroethane.

12. Respondent did not and has not filed with the Administrator or authorized state a complete, timely, and accurate notification required by and in accordance with Section 3010(a) of RCRA, 42 U.S.C. §6930(a), and transported and treated, stored, and/or disposed of hazardous wastes, all in violation of Section 3010(a) of RCRA, 42 U.S.C. §6930(a).

13. Pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, and based upon the allegations stated in paragraphs 1 through 12, it is proposed that a civil penalty in the amount of \$1,000 be assessed for Respondent's violation of Section 3010(a) of RCRA, 42 U.S.C. §6930(a).

Count II

14. The allegations of paragraph 1 are herein incorporated and realleged.
15. The allegations of paragraph 2 are herein incorporated and realleged.
16. The allegations of paragraph 3 are herein incorporated and realleged.
17. The allegations of paragraph 4 are herein incorporated and realleged.
18. The allegations of paragraph 5 are herein incorporated and realleged.
19. The allegations of paragraph 6 are herein incorporated and realleged.
20. The allegations of paragraph 7 are herein incorporated and realleged.
21. As Respondent's activities regarding the disposal, storage and transportation of the hazardous waste 1,1,1-trichloroethane was in a manner inconsistent with the requirements of 40 C.F.R. §261.5(g)(3), the subject hazardous waste is subject to full regulation under RCRA, thereby requiring Respondent to have a permit issued to treat, store or dispose of hazardous waste pursuant to Section 3005(a) of RCRA, 42 U.S.C. §6925(a), which includes the submittal of a Part A Hazardous Waste Permit Application pursuant to 40 C.F.R. §122.22(a)(1).
22. The regulation at 40 C.F.R. §122(a)(1), promulgated pursuant to Section 3005(a) of RCRA, 42 U.S.C. §6925(a), states in part:

"Owners and operators of existing hazardous waste management facilities must submit Part A of their permit application to the Regional Administrator no later than (i) six months after the date of publication of regulations which first requires them to comply with the standards set forth in 40 C.F.R. Parts 265 or 266,...".
23. Regulations requiring Respondent to comply with 40 C.F.R. Parts 265 or 266 were published by EPA on May 19, 1980, [45 Fed. Reg. 33154, et seq. (1980)].
24. Respondent did not and has not submitted Part A of its Hazardous Waste Permit Application to EPA in violation of 40 C.F.R. §122.22(a)(1), and therefore has treated, stored and/or disposed of hazardous waste in violation of Section 3005(a) of RCRA, 42 U.S.C. §6925(a).
25. Pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, and based upon the allegations stated in paragraphs 14 through 24, it is proposed that a civil penalty in the amount of \$5,000 be assessed against Respondent.

Count III

26. The allegations of paragraph 1 are herein incorporated and realleged.
27. The allegations of paragraph 2 are herein incorporated and realleged.
28. The allegations of paragraph 3 are herein incorporated and realleged.
29. The allegations of paragraph 4 are herein incorporated and realleged.
30. The allegations of paragraph 5 are herein incorporated and realleged.
31. The allegations of paragraph 6 are herein incorporated and realleged.
32. The allegations of paragraph 7 are herein incorporated and realleged.
33. As Respondent's activities regarding the disposal, storage and transportation of the hazardous waste 1,1,1-trichloroethane was in a manner inconsistent with the requirements of 40 C.F.R. §261.5(g)(3), the subject hazardous waste is subject to full regulation under RCRA, thereby requiring Respondent to comply with 40 C.F.R. §262.20(a).
34. The regulation at 40 C.F.R. §262.20(a) states:

"A generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a manifest before transporting the waste off-site."
35. Respondent transported or offered for transportation the hazardous waste 1,1,1-trichloroethane for treatment or disposal at an off-site facility, referred to in paragraph 31, without preparing a manifest, in violation of 40 C.F.R. §262.20(a).
36. Pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, and based upon the allegations stated in paragraphs 26 through 35, it is proposed that a civil penalty in the amount of \$2,000 be assessed for Respondent's violation of 40 C.F.R. §262.20(a).

Count IV

37. The allegations of paragraph 1 are herein incorporated and realleged.
38. The allegations of paragraph 2 are herein incorporated and realleged.
39. The allegations of paragraph 3 are herein incorporated and realleged.
40. The allegations of paragraph 4 are herein incorporated and realleged.
41. The allegations of paragraph 5 are herein incorporated and realleged.

42. The allegations of paragraph 6 are herein incorporated and realleged.
43. The allegations of paragraph 7 are herein incorporated and realleged.
44. As Respondent's activities regarding the disposal, storage and transportation of the hazardous waste 1,1,1-trichloroethane was in a manner inconsistent with the requirements of 40 C.F.R. §261.5(g)(3), the subject hazardous waste is subject to full regulation under RCRA, thereby requiring Respondent to comply with 40 C.F.R. §262.34(a)(3).
45. The regulation at 40 C.F.R. §262.34 states, in part:
- "(a) A generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:
- ...(3) while being accumulated on-site, each container and tank is labelled or marked clearly with the words, 'Hazardous Waste'..."
46. On and prior to August 27, 1982, Respondent accumulated on-site the hazardous waste 1,1,1,-trichloroethane in a 700-gallon storage tank that was not marked with the words 'Hazardous Waste', for more than ninety (90) days without a permit and without interim status, in violation of 40 C.F.R. §262.34(a)(3).
47. Pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, and based upon the allegations stated in paragraphs 37 through 46, it is proposed that a civil penalty in the amount of \$500 be assessed for Respondent's violation of 40 C.F.R. §262.34(a)(3).

Count V

48. The allegations of paragraph 1 are herein incorporated and realleged.
49. The allegations of paragraph 2 are herein incorporated and realleged.
50. The allegations of paragraph 3 are herein incorporated and realleged.
51. The allegations of paragraph 4 are herein incorporated and realleged.
52. The allegations of paragraph 5 are herein incorporated and realleged.
53. The allegations of paragraph 6 are herein incorporated and realleged.
54. The allegations of paragraph 7 are herein incorporated and realleged.
55. As Respondent's activities regarding the disposal, storage and transportation of the hazardous waste 1,1,1-trichloroethane was in a manner inconsistent with the requirements of 40 C.F.R. §261.5(g)(3), the subject

hazardous waste is subject to full regulation under RCRA, thereby requiring Respondent to comply with 40 C.F.R. §262.34(a)(4) and 40 C.F.R. §265.31.

56. The regulation at 40 C.F.R. §262.34(a) states, in part:

"(a) A generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

...(4) the generator complies with the requirements for owners and operators in Subparts C and D in 40 C.F.R. Part 265 and with §265.16..."

57. The regulation at 40 C.F.R. §265.31, in Subpart C of 40 C.F.R. Part 265, states:

"Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment."

58. Based in part on the inspections performed at Respondent's facility by EPA on July 1, 1982, and August 27, 1982, it was determined that Respondent had caused hazardous waste 1,1,1-trichloroethane to be discharged into a floor drain that ultimately led to the Blue River, and had allowed the hazardous waste 1,1,1-trichloroethane to leak from an open valve on a 700-gallon storage tank containing this hazardous waste into the soil, both in a manner that could threaten human health or the environment, and that Respondent was therefore maintaining and operating a facility that did not minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to surface water and soil, in violation of 40 C.F.R. §§262.34(a)(4) and 265.31.

59. Pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, and based upon the allegations stated in paragraphs 48 through 58, it is proposed that a civil penalty in the amount of \$10,000 be assessed for Respondent's violation of 40 C.F.R. §262.34(a)(4) and 40 C.F.R. §265.31.

Count VI

60. The allegations of paragraph 1 are herein incorporated and realleged.

61. Respondent, a person as defined in 40 C.F.R. §260.10, is or has been a generator of paint stripper sludge, a solid waste as defined at 40 C.F.R. §261.2.

62. The regulation at 40 C.F.R. §262.11 states:

"A person who generates a solid waste, as defined in 40 C.F.R. §261.2, must determine if that waste is a hazardous waste using the following method:

- (a) he should first determine if the waste is excluded from regulation under 40 C.F.R. §261.4.
- (b) he must then determine if the waste is listed as a hazardous waste in Subpart D of 40 C.F.R. Part 261.
- (c) if the waste is not listed as a hazardous waste in Subpart D of 40 C.F.R. Part 261, he must determine whether the waste is identified in Subpart C of 40 C.F.R. Part 261 by either:
 - (1) testing the waste according to the method set forth in Subpart C of 40 C.F.R. Part 261, or according to an equivalent method approved by the Administrator under 40 C.F.R. §260.21; or
 - (2) applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used."

63. On and at least six months prior to August 27, 1982, Respondent stored on-site eighteen 55-gallon containers of waste paint stripper sludge. At the time of the August 27, 1982, EPA inspection, Respondent had not yet determined whether this waste paint stripper sludge was a hazardous waste in accordance with 40 C.F.R. §262.11, causing Respondent to be in violation of said requirement.

64. Pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, and based upon the allegations stated in paragraphs 60 through 63, it is proposed that a civil penalty of \$750 be assessed against Respondent for failing to comply with 40 C.F.R. §262.11.

COMPLIANCE ORDER

65. IT IS HEREBY ORDERED that the total penalty of \$19,250 shall be made by certified or cashier's check payable to "United States Treasury" and remitted to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region VII, 324 East 11th Street, Kansas City, Missouri 64106.

66. IT IS FURTHER ORDERED that ARMCO, Inc., Union Wire Rope Division, take the following corrective actions within the time periods specified:

- (a) Immediately upon receipt of this Compliance Order, cease discharging waste 1,1,1-trichloroethane into the Blue River.
- (b) Immediately upon receipt of this Compliance Order, cease disposing on-site waste 1,1,1-trichloroethane.

(c) Within thirty (30) days of receipt of this Compliance Order, submit a plan to EPA for removing and properly disposing of all hazardous waste previously disposed of at the facility.

(d) Within thirty (30) days of receipt of this Compliance Order, either: (i) meet the requirements of 40 C.F.R. §261.5(g) pertaining to small quantity generators, or (ii) comply with all applicable requirements of 40 C.F.R. Parts 262 through 265, and Parts 122 and 124, and the notification requirements of Section 3010 of RCRA, 42 U.S.C. §6930.

(e) Within forty-five (45) days of receipt of this Compliance Order, determine if the waste paint stripper sludge, presently stored on-site, is a hazardous waste pursuant to 40 C.F.R. §261.11 and submit specific evidence of that determination, including testing results, to EPA.

(f) If the waste, referred to in paragraph 66(e) is determined to be a hazardous waste, within ninety (90) days of receipt of this Compliance Order, remove and properly dispose of all waste paint stripper sludge presently stored on-site.

All documents required to be submitted by the Compliance Order shall be sent to Mr. J. Scott Pemberton, Attorney, Office of Regional Counsel, U.S. Environmental Protection Agency, 324 East 11th Street, Kansas City, Missouri 64106.

67. In accordance with Section 3008(a)(3) of RCRA, 42 U.S.C. §6928(a)(3), Respondent shall be liable for a civil penalty of not more than \$25,000 for each day of continued noncompliance for failure to complete corrective actions within the times specified in this Compliance Order.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

68. In accordance with Section 3008(b) of RCRA, 42 U.S.C. §6928(b), the Compliance Order shall become final unless Respondent files an answer and requests a public hearing in writing no later than thirty (30) days after service of this Complaint, Compliance Order, and Notice of Opportunity for Hearing.

69. A written answer to the Complaint and Compliance Order and the request for hearing must satisfy the requirements of 40 C.F.R. §22.15 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, a copy of which is attached hereto. The answer and request for hearing must be filed with the Regional Hearing Clerk, U.S. EPA, Region VII, 324 East 11th Street, Kansas City, Missouri 64106. A copy of the answer and request for hearing and copies of any subsequent documents filed in this action should be sent to Mr. J. Scott Pemberton, Attorney, Office of Regional Counsel, at the same address.

70. Respondent's failure to file a written answer and a request for hearing within thirty (30) days of service of this Complaint, Compliance Order and Notice of Opportunity for Hearing will constitute a binding admission of all allegations contained in the Complaint and a waiver of Respondent's right to a hearing. A Default Order may thereafter be issued by the Regional Administrator, and the civil penalties proposed herein shall become due and payable without further proceedings.

SETTLEMENT CONFERENCE

71. Whether or not Respondent requests a hearing, an informal conference may be requested in order to discuss the facts of this case and to arrive at settlement. To request a settlement conference, please write to Mr. J. Scott Pemberton, Attorney, Office of Regional Counsel, at the above address, or call him at (816) 374-3171.

72. Please note that a request for an informal settlement conference does not extend the thirty (30) day period during which a written answer and request for hearing must be submitted. The informal conference procedure may be pursued simultaneously with the adjudicatory hearing procedure.

73. EPA encourages all parties against whom a civil penalty is proposed to pursue the possibility of settlement as a result of informal conference. However, no penalty reduction will be made simply because such a conference is held. Any settlement which may be reached as a result of such a conference shall be embodied in a written Consent Agreement and Consent Order issued by the Regional Administrator, U.S. EPA, Region VII. The issuance of such a Consent Agreement and Consent Order shall constitute a waiver of Respondent's right to request a hearing on any matter therein.

74. If Respondent has neither effected a settlement by informal conference nor requested a hearing within the thirty (30) day time period allowed by the Complaint, Compliance Order and Notice of Opportunity for Hearing, the penalties will be assessed without further proceedings and Respondent will be notified that the penalties have become due and payable.

12/22/82

Date

for William Kay

Morris Kay
Regional Administrator
U.S. EPA, Region VII

Dec. 20, 1982

Date

J. Scott Pemberton

J. Scott Pemberton
Attorney, Office of Regional Counsel
U.S. EPA, Region VII

CERTIFICATE OF SERVICE

I hereby certify that the original and one copy of the foregoing Complaint, Compliance Order, and Notice of Opportunity for Hearing were hand delivered to Rita Ricks, Regional Hearing Clerk, EPA, Region VII, 324 East 11th Street, Kansas City, Missouri 64106; and true and correct copies of the same, together with copies of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, were sent by certified mail, return receipt requested, to:

C.T. Corporation System
Registered Agent for Armco, Inc.
Union Wire Rope Division
314 North Broadway
St. Louis, Missouri 63102

Mr. Jerry K. Fuller
ARMCO, Incorporated
Union Wire Rope Division
7000 Roberts Street
Kansas City, Missouri 64125

this 31st day of December, 1982.

Janet Chapin
Janet Chapin

cc: Art Groner
Missouri Department of Natural Resources